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June 11, 2021

VIA ECF

Hon. John G. Koeltl
U.S. District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, New York 10007

Re: Antonio Perez v. 666 LLC, Genesis Realty Group LLC, Jac Zadrima,

William Fernandez, and Wilfredo Cuascut

Case No. 20-cy-05636 (JGK)

Dear Judge Koeltl:

We represent the Defendants in the above-referenced action.

We write, jointly with Plaintiff's counsel, to respectfully request an extension of the deadline to file the motion for approval of the settlement from June 11, 2021 until July 2, 2021. While the parties have made significant progress on the settlement paperwork, the parties are still negotiating a few of the terms of the Settlement and Release Agreement. As such, this extension is respectfully requested to provide time for the parties to complete and finalize the settlement paperwork. This is the second request for an extension of this deadline.

Thank you for your consideration of the foregoing.

Respectfully yours, Kaufman Dolowich & Voluck, LLP

By: _____

Matthew Cohen

cc: All counsel of record via ECF

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